

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 31, 2018

Jimmie Cho, Senior Vice President  
Gas Operations and System Integrity  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

GI-2018-05-SCG-67

**Subject: General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection  
of Southern California Gas Company's North Valley Distribution Area**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's (SCG) North Valley Distribution Area (Inspection Unit) on May 7-18, 2018. SED's staff used Pipeline and Hazardous Material Safety Administration's (PHMSA) Inspection Assistant (IA) protocols as a reference guideline. The inspection included a review of the Inspection Unit's leak survey and patrolling records for calendar year 2017, cathodic protection (CP) records for calendar years 2015 to 2017, M&R and critical valves records for calendar years 2016-2017, and field inspections of pipeline facilities in the Branford, Valencia, and Lancaster districts. Also, SED's staff reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's staff identified two violations which are described in the enclosed "Summary of Inspection Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SCG to address the probable violations noted in the Summary of Inspection Findings.

If you have any questions, please contact Michelle Wei, at (213) 620-2780 or by email: [miw@cpuc.ca.gov](mailto:miw@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Michelle Wei, SED/GSRB  
Troy Bauer, Semptra  
Kan Wai Tong, SED/GSRB  
Kelly Dolcini, SED/GSRB

**Summary of Inspection Findings**  
**2018 SCG North Valley Distribution Inspection**  
**May 7-18, 2018**

**I. SED Identified Probable Violations**

**1. Title 49 CFR Part 192 §192.465(a) – External Corrosion Control: Monitoring**

*“Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.”*

During record review, SED noted that the Inspection Unit did not survey two separate service lines that are under “short sections” cathodic protection (CP) systems that are required to be inspected every 10 years pursuant to Part 192 Section 192.465(a). See the following table for further information.

<b>District</b>	<b>Service ID</b>	<b>Address</b>	<b>City</b>	<b>Date last inspected</b>	<b>Date inspected</b>
Branford	02323042	13525 Pinney	Pacoima	8/14/2006	5/11/18
Branford	00297065	240 Providencia	Burbank	4/9/2007	5/11/18

On May 11, 2018, SCG’s CP technician tested these two service lines and indicated that the read was within tolerance. SCG’s record indicated that another CP technician visited the 13525 Pinney St location and took a CP read at the wrong riser and marked it as replaced in his records. SED visited this site during the field inspections and noted that there were two risers on the same property. One of the risers was an Anodeless riser and the other was steel riser that required the cathodic protection. Also, SCG misidentified the riser at 240 Providencia St as an Anodeless riser during its 2017 routine CP inspection. The Inspection Unit failed to conduct the CP monitoring within the 10 years interval. Therefore, SCG is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section §192.465(a). SED also identified 2 other risers that were misidentified as Anodeless risers, but were not out of the compliance window. See the table below for more information.

<b>District</b>	<b>Service ID</b>	<b>Address</b>	<b>City</b>	<b>Date added to CP program</b>	<b>Date inspected</b>
Branford	03403207	11133 O’Melveny Ave	San Fernando	4/1/2012	5/11/18
Branford	02732138	5225 Blakeslee	North Hollywood	8/24/14	5/23/18

## **2. Title 49 CFR Part 192 §192.465(d) – External Corrosion Control: Monitoring**

*“Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.”*

During field inspection, SED noted that the Inspection Unit did not take prompt action to remediate a deficiency on a “CP-10” section of pipe. On September 20, 2016, SCG’s CP technician took read a CP read at a gas facility on 1520 5<sup>th</sup> St, San Fernando in Valencia District (service ID # 03585020) that indicated -0.60 Volts, which is below the -0.85 Volts criteria. SED’s staff and SCG’s staff visited this site and SCG took a CP read that indicated -0.486 Volts. SCG did not provide SED any evidence of remedial action since its discovery of the deficiency. Therefore, SCG is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section §192.465(d).